

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UBIQUITI INC.,

Plaintiff,

v.

Civil No.: 20-CV-1312

PERASO TECHNOLOGIES INC., WILLIAM A.  
McLEAN, WILLIAM JAMES WHITAKER, SHAWN  
ABBOTT, DAVID ADDERLEY, IMED ZINE and  
RIADH ZINE,

Defendants.

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**MEMO ENDORSED**

**NOTICE OF CHAPTER 15 BANKRUPTCY PROCEEDING  
IN THE SOUTHERN DISTRICT OF NEW YORK AND INTERIM STAY RELATED TO  
A RECOGNITION PROCEEDING FOR RESTRUCTURING UNDER  
CANADA'S COMPANIES' CREDITORS ARRANGEMENT ACT**

**PLEASE TAKE NOTICE THAT:**

This action is the subject of a stay as issued by the Honorable Sean H. Lane of the United States Bankruptcy Court, Southern District of New York as detailed below.

Peraso Technologies Inc. ("Peraso") is the subject of a petition for recognition of a foreign proceeding under Chapter 15 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of New York. The Verified Petition for Recognition of Foreign Proceeding and Related Relief, 20-11354-shl (the "Chapter 15 Petition") was brought by Ernst & Young as Monitor, and is attached as Exhibit A.

Peraso's underlying application for relief giving rise to the Chapter 15 Petition was made pursuant to the Companies' Creditors Arrangement Act and was filed with the Ontario Superior Court of Justice on June 3, 2020. A copy of the Initial Order issued by the Ontario Superior Court of Justice, appointing Ernst & Young as Monitor of Peraso's affairs and staying

all proceedings against Peraso and its former, current, or future directors and officers, is attached as Exhibit B. *See* Ex. B, ¶ 15, 19.

In an Emergency Motion for Preliminary Relief (the “Motion”) before Judge Lane, the Monitor sought to enforce the terms of the Initial Order in the United States and sought an interim stay of this action until such time as proceedings on its Petition for Recognition were complete. Ubiquiti Inc. contested the Motion. Counsel for the Monitor, Peraso and Ubiquiti Inc. were present before the Court on the motion on June 8, 2020.

On June 8, 2020, Judge Lane granted the Motion and an interim stay of this action as to all Defendants on the record. When the written order issues, counsel will file with this Court.

Dated: June 10, 2020

Respectfully,

In light of the foregoing, this action is hereby stayed and placed on the suspense calendar pending further order of the Court. Plaintiff is directed to file a status report as of December 1, 2020, and each June 1 and December 1 thereafter, as to whether the maintenance of this action on the docket of this Court remains necessary. DE#57 resolved. SO ORDERED.

6/11/2020

/s/Laura Taylor Swain, USDJ

s/Jodyann Galvin

Jodyann Galvin

HODGSON RUSS LLP

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